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To: Whom it may concern at the Environmental Protection Agency  
From: Jennifer Hadayia, Executive Director at Air Alliance Houston  
Date: February 22, 2022

**Subject: The Environmental Protection Agency's Ethylene Oxide Miscellaneous Organic Chemical Manufacturing Risk rulemaking**

Good afternoon, my name is Jennifer Hadayia, and I am the Executive Director of Air Alliance Houston. Air Alliance Houston is a nonprofit organization working to reduce the public health impacts of air pollution and advance environmental justice in the Greater Houston Area. I thank you for the opportunity to speak today.

To start, we want to formally endorse *and applaud* the EPA's decision to uphold the 2016 IRIS risk value for Ethylene Oxide and to reject the TCEQ's *less* protective value. Not only is this decision an endorsement of the best available science (as others have testified), but it also signals to TCEQ and others that the needs of public health are paramount to the needs of industry. It also shows that the EPA listens and responds to people directly and disproportionately affected by environmental harm.

Houston is an industrial cancer "hot spot" due to a proliferation of air pollution sources, particularly on the East Side of the city along the Houston Ship Channel. I believe Administrator Regan saw this first-hand on his "Journey to Justice" tour in November of 2021 and that today's decision is directly related to that experience.

I understand this first-hand myself. My family has three generations who lived and/or worked along the Houston Ship Channel either at the refineries or the Port. People near chemical facilities like these are exposed long-term to elevated levels of Hazardous Air Pollutants and face serious health risks as a result.

When Administrator Regan visited Houston, I am sure he also heard the discouragement that comes from so many years of advocating for change. The decision the EPA is making today tells the community that the EPA hears them and that the work is worth it.

To that end:

After reaffirming the 2016 IRIS risk value, we urge the EPA to use its full authority to strengthen protections from all Ethylene Oxide emitting sources in Houston and across Texas:

**To start**, there should be immediate action toward Ethylene Oxide emissions reduction through strong federal rulemaking for all relevant sectors plus oversight of TCEQ to hold polluters accountable to the stronger standard.

**Second**, we urge EPA to require fence-line ambient air monitoring to accurately assess how much Ethylene Oxide as well as other air pollutants are being emitted at the neighborhood level.

**Third**, Houston communities need and deserve accurate information about what they have been exposed to and how it affects their risk of disease, so they can take action to protect their health. We encourage the completion of local-level studies of actual exposure risk to Ethylene Oxide, followed by education and support of community members to access needed health resources.

**Lastly**, we ask the EPA to work with state agencies like TCEQ to use the best available science when making decisions intended to be protective of human health and the environment, which is their mission.

Ending the harm of Ethylene Oxide and of other toxic air pollution that have cumulatively, repeatedly, and over time injured the same communities is the only acceptable final destination on a Journey to Justice.

Air Alliance Houston is prepared to work with the EPA and stakeholders to implement these changes.

[Everyone has a right to breathe clean air.](#)

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Again, thank you for the opportunity to speak today and thank you for prioritizing the needs of those disproportionately affected by environmental harm including so many of my fellow Houstonians.

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